

# **EXHIBIT 2**

**Patrick Schmidt**

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**From:** Andrea P Roberts  
**Sent:** Sunday, December 03, 2017 10:58 PM  
**To:** 'Chang, Esther Kim'; QE-Waymo; John Cooper (JCooper@fbm.com); Matthew Cate (MCate@fbm.com)  
**Cc:** UberWaymoMoFoAttorneys; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com); Uber-sg@LISTS.SUSMANGODFREY.COM  
**Subject:** RE: Waymo v. Uber: Deposition dates

Counsel,

We confirm the following deposition dates. Based on Esther's email, we understand that all will be in San Francisco, except for Ms. Huffington's.

<b>Witness</b>	<b>Deposition Date</b>
Kevin Maher	Tuesday, December 12, 2017
Lior Ron	Tuesday, December 12, 2017
Travis Kalanick	Thursday, December 14, 2017
Joe Sullivan	Thursday, December 14, 2017
Jake Nocon	Tuesday, December 19, 2017
Ariana Huffington	Tuesday, December 19, 2017
Ed Russo	Wednesday, December 20, 2017
Shawnee Delaney	Wednesday, December 20, 2017
Nick Gicinto	Thursday, December 21, 2017
Joe Spiegler	Friday, December 22, 2017
Mat Henley	Friday, December 22, 2017

With respect to Mr. Ron, we will agree to start the deposition at 11:15 am, as requested, but reserve the right to continue the deposition on a later date if we do not complete it in the time available given the late start.

I believe we're still waiting on a date for Craig Clark. On Friday, Arturo indicated that Clark had retained counsel and that Uber was working with him on scheduling. We are working on scheduling for Ric Jacobs and Clayton Halunen.

In response to Shawn Rabin's December 1 email, we would like to take the deposition of David Trujillo and for David Bonderman to provide the affidavit described in Shawn's email. We reserve the right to take Mr. Bonderman's deposition based on other discovery we obtain.

We additionally request to depose: Pooja Ashok, Prithvi Rai, and Jeff Jones. We understand that they all recently resigned from Uber. Please promptly let us know if Uber will handle scheduling their depositions or if we should contact them directly.

Lastly, with respect to Waymo's RFPs served on Uber, please let us know when we can expect full production and privilege logs. Waymo needs sufficient time to review and analyze Uber's documents prior to the upcoming depositions of the Uber and third party witnesses.

Thanks,  
Andrea

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**From:** Chang, Esther Kim [mailto:[echang@mofo.com](mailto:echang@mofo.com)]  
**Sent:** Sunday, December 03, 2017 10:03 PM  
**To:** Andrea P Roberts <[andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)>; QE-Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>; John Cooper (JCooper@fbm.com) <[JCooper@fbm.com](mailto:JCooper@fbm.com)>; Matthew Cate (MCate@fbm.com) <[MCate@fbm.com](mailto:MCate@fbm.com)>  
**Cc:** UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com) <[BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)>; Uber-[sg@LISTS.SUSMANGODFREY.COM](mailto:sg@LISTS.SUSMANGODFREY.COM)  
**Subject:** RE: Waymo v. Uber: Deposition dates

Andrea,

Confirming that all witnesses for whom dates have been offered are being offered in San Francisco, with the exception of Ariana Huffington (as you note). In addition, we offer Shawnee Delaney on December 20 (also in San Francisco). Uber has now offered dates for all witnesses that it controls.

Esther  
Tel: (415) 268-7562

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**From:** Andrea P Roberts [mailto:[andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)]  
**Sent:** Sunday, December 03, 2017 4:32 PM  
**To:** Chang, Esther Kim; QE-Waymo; John Cooper ([JCooper@fbm.com](mailto:JCooper@fbm.com)); Matthew Cate ([MCate@fbm.com](mailto:MCate@fbm.com))  
**Cc:** UberWaymoMoFoAttorneys; Boies Service ([BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)); [sg@LISTS.SUSMANGODFREY.COM](mailto:Uber-<a href=)  
**Subject:** RE: Waymo v. Uber: Deposition dates

- External Email -

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Esther, with the exception of Ariana Huffington, are all of the witnesses with dates offered so far (in your email below) being made available in San Francisco?

Thanks.

Andrea

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**From:** Chang, Esther Kim [mailto:[echang@mofo.com](mailto:echang@mofo.com)]  
**Sent:** Saturday, December 02, 2017 12:52 PM  
**To:** QE-Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>; John Cooper ([JCooper@fbm.com](mailto:JCooper@fbm.com)) <[JCooper@fbm.com](mailto:JCooper@fbm.com)>; Matthew Cate ([MCate@fbm.com](mailto:MCate@fbm.com)) <[MCate@fbm.com](mailto:MCate@fbm.com)>  
**Cc:** UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; Boies Service ([BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)) <[BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)>; [sg@LISTS.SUSMANGODFREY.COM](mailto:Uber-<a href=)  
**Subject:** Waymo v. Uber: Deposition dates

Counsel,

Kevin Maher is available for deposition on December 12. Joe Spiegler is available for deposition on December 22. Below is the list of all offered dates thus far. Please confirm dates as soon as possible.

<b>Witness</b>	<b>Deposition Date</b>
Salle Yoo	Wednesday, December 06, 2017
Kevin Maher	Tuesday, December 12, 2017
Travis Kalanick	Thursday, December 14, 2017
Joe Sullivan	Thursday, December 14, 2017
Jake Nocon	Tuesday, December 19, 2017
Ed Russo	Wednesday, December 20, 2017
Nick Gicinto	Thursday, December 21, 2017
Joe Spiegler	Friday, December 22, 2017
Mat Henley	Friday, December 22, 2017

**Esther Kim Chang**

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